

Intent to Take Oral depositions on June 12, 2017, since there are existing disputes of material fact.

A schedule may be modified only for good cause and with the judge's consent. FED. R. CIV. P. 16(b)(4). Since deadlines (including a trial deadline) were terminated and this case was transferred, the Docket Control Order entered August 12, 2016 does not give Plaintiff ample time to conduct the additional discovery needed. Moreover, it became obvious during the failed mediation on June 4, 2017 that additional limited discovery was necessary. Entering a new docket control order to extend the deadline for discovery, filing dispositive motions, and joint pretrial orders and motions in limine would not prejudice Defendant other than grant a continuance for filing of a motion for summary judgment after further inquiry into crucial issues of material fact.

Therefore, the Plaintiff respectfully requests that this Court enter a new docket control order.

Respectfully submitted,

COANE AND ASSOCIATES, PLLC

By: /s/ct

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that on June 13th, 2017 at approximately 6:09PM, I spoke with Holly Williamson, counsel for Defendant. Mrs. Williamson stated that she would be opposed to a new docket control order.

/s/ct
Connor Throckmorton

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of June, 2017, I served a copy of the foregoing via the Court's ECF system on all counsel of record as set forth in the service list.

/s/ct
Connor Throckmorton

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